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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION TO LODGE
MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-
2 5(b), and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on
3 February 10, 2016 (Dkt. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
4 Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated
5 (collectively, "Plaintiffs") hereby move this Court for leave to redact certain portions of their reply
6 in support of their motion to challenge Defendant's assertion of attorney-client privilege over one
7 certain document. Specifically, Plaintiffs seek to redact any excerpts from, or specific descriptions
8 of the disputed document, an email which was filed under seal in unredacted form as Exhibit 3 to
9 the Declaration of Matthew S. Weiler which accompanied Plaintiffs' motion, filed on April 1,
10 2016. Dkt. 229-1. Plaintiffs also seek to redact references to the Declaration of Thomas Paschall,
11 which is the subject of Zuffa's motion to seal. *See* Dkt. 232.

12 Plaintiffs have filed their reply in accordance with the Court's ECF system.

13 Plaintiffs take no position concerning whether these materials should be sealed under the
14 standards governing sealed records. As set forth in their motion and reply, it is Plaintiffs' position
15 that the challenged communications contained in Mr. Paschall's email at issue are not protected by
16 the attorney-client privilege.

17 Plaintiffs will serve un-redacted version of the reply on Defendant.
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1 DATED this 18th day of April, 2016

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Joseph R. Saveri

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2016 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Matthew S. Weiler